

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**FLORENCE SUCHOMSKI,**

**Plaintiff,**

**v.**

**THE HARTFORD LIFE INSURANCE  
COMPANY, and DRESS BARN  
INCORPORATED GROUP LONG TERM  
DISABILITY PLAN,**

**Defendants.**

**Case No. 08-CV-2880**

**MOTION FOR EXTENSION OF TIME**

Defendants, HARTFORD LIFE INSURANCE COMPANY (“HARTFORD”) and DRESS BARN INCORPORATED GROUP LONG TERM DISABILITY PLAN (“PLAN”), by their attorneys, Donald A. Murday, Elizabeth G. Doolin, Joseph R. Jeffery, and CHITTENDEN, MURDAY & NOVOTNY LLC, pursuant to Fed. R. Civ. P. 6(b), hereby request that this Court enter an order extending by twenty-one days the time period for HARTFORD and the PLAN to answer or otherwise plead in response to Plaintiff’s Complaint. In support of said Motion, HARTFORD and the PLAN state as follows:

1. HARTFORD was formally served with the Complaint and Summons on or about May 20, 2008.

2. It is not clear whether the PLAN has been served. Either way, the undersigned counsel has appeared on the PLAN’s behalf and joins in this Motion.

3. Pursuant to this Court’s June 12, 2008 Minute Order, the defendants’ responsive pleading is due on July 9, 2008.

4. Defendants and their counsel require an additional period of time in which to gather file materials, evaluate Plaintiff’s allegations, and prepare a good faith responsive

pleading to same. In accordance with Fed. R. Civ. P. 6(b), Defendants requests an additional twenty-one (21) days, to and including July 30, 2008, to answer or otherwise plead in response to the Complaint.

5. This Motion is not brought to unnecessarily delay the proceedings in this matter, but is based on the good faith belief that an additional period of time is necessary in order to draft a good faith responsive pleading. The granting of this Motion will not prejudice any party hereto.

6. Defendants' counsel has communicated with counsel for Plaintiff concerning this Motion and counsel advised that Plaintiff has no objection to the same.

**WHEREFORE**, Defendants, HARTFORD LIFE INSURANCE COMPANY and DRESS BARN INCORPORATED GROUP LONG TERM DISABILITY PLAN, respectfully request that this Court enter an order granting their Motion for Extension of Time for twenty-one (21) additional days, to and including July 30, 2008, to answer or otherwise plead in response to Plaintiff's Complaint.

Respectfully submitted,

**HARTFORD LIFE INSURANCE COMPANY  
AND DRESS BAR INCORPORATED GROUP  
LONG TERM DISABILITY PLAN**

By: /s/ Joseph R. Jeffery

One of their attorneys

Donald A. Murday  
Elizabeth G. Doolin  
Joseph R. Jeffery  
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**Certificate of Service**

I hereby certify that on **July 9, 2008** I electronically filed the foregoing Defendant Hartford Life and Accident Insurance Company and Dress Barn Incorporated Group Long Term Disability Plan's Motion for Extension of Time with the Clerk of the U.S. District Court, Northern District of Illinois, Eastern Division, using the CM/ECF system which sent notification of such filing to the following CM/ECF registered participants:

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**DATED** this **9th** day of **July, 2008**.

/s/ Joseph R. Jeffery  
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